<u>REMARKS</u>

Claims 1, 4-7 and 10-26 are pending in this application. By this Amendment, claims 1, 5, 14 and 22 are amended and claims 2, 3, 8, 9 and 15 are canceled. Support for the amended claims may be found in the original specification at, for example, original claims 2, 3, 8, 9 and 15. No new matter is added.

Applicants appreciate the courtesies shown to Applicants' representative by Examiner Rashidian and Examiner Ahmed in the February 26, 2008 interview. Applicants' separate record of the substance of the interview is incorporated into the following remarks.

Reconsideration of the application is respectfully requested.

<u>Claim Rejections</u>

Claims 1-23 were rejected under 35 U.S.C. §102(b) as allegedly being anticipated by U.S. Patent No. 4,718,090 ("Cooper").

Claims 24-26 were rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Cooper in view of U.S. Patent No. 7,006,244 ("Loce").

Applicants respectfully traverse each of the above rejections.

None of the applied references, alone or in combination, teach or suggest a method for identifying regions of pixels in image data, including counting a total number of pixels and blobs associated with the temporary blob identifier and calculating a normalized color value for the temporary blob identifier, based on a summation of pixel color values and the total number of pixels and the blobs associated with the temporary blob identifier, as recited in claim 1.

The Patent Office alleges that Cooper discloses counting a total number of pixels in blobs associated with the temporary blob identifier. Applicants respectfully disagree.

The Patent Office relies on column 4, lines 44-56 of Cooper as allegedly disclosing the above feature. However, the blob number disclosed in Cooper merely contains an

identification as to whether the blob number is assigned to either a white or a black blob, and does not contain the number of total pixels in the blob associated with a temporary blob identifier, as alleged by the Patent Office and required in claim 1.

Further, the Patent Office alleges that Cooper teaches calculating a normalized color value for a temporary blob identifier, based on a summation of pixel color values and a total number of pixels in the blobs associated with the temporary blob identifier. Applicants respectfully disagree.

The Patent Office relies on column 15, lines 55-65 of Cooper as allegedly disclosing the above feature. However, Cooper merely discloses that a blob number corresponding to pixels on a preceding line is received in a blob ancestor linking circuitry as a blob number and if a match occurs between pixels in the previous line with the pixels in the present line, the blob number of the pixels on the previous line is temporarily stored in register 370. However, nowhere does Cooper teach or suggest calculating a normalized color value for a temporary blob identifier based on a summation of pixel color values in the total number of pixels in a blob associated with the temporary blob identifier as required in claim 1.

Loce

Loce is relied on by the Patent Office as allegedly disclosing computer processing techniques, a zero graphic marking device, and a digital photo copier using the method of claim 1. However, even if Loce is relied on as allegedly disclosing the above features, Loce fails to remedy the deficiencies of Cooper in disclosing or rendering obvious the features of claim 1.

Claims 5, 14 and 22

Claims 5, 14 and 22 each include a feature wherein the temporary blob identifier includes a total number of pixels in the blobs associated with the temporary blob identifier and when a normalized color value is calculated for the temporary blob identifier based on a

summation of a pixel of color values and the total number of pixels and the blobs associated with the temporary blob identifier.

Thus, for at least the same reasons presented above with respect to claim 1, claims 5, 14 and 22 are also neither taught nor suggested by the applied references.

Conclusion

For at least the foregoing reasons, claims 1, 4-7 and 10-26 are patentable over the applied references. Reconsideration and withdrawal of the rejections under 35 U.S.C. §102(b) and 35 U.S.C. §103(a) are respectfully requested.

**Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1, 4-7 and 10-26 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,

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